

U.S. Department of Justice

United States Attorney Eastern District of New York

AAS:ICR F. #2015R01787

271 Cadman Plaza East Brooklyn, New York 11201

February 19, 2019

By Email and ECF

Robert J. Cleary, Esq. Dietrich L. Snell, Esq. Brittany N. Benavidez, Esq. Samantha Springer, Esq. Proskauer Rose LLP Eleven Times Square New York, NY 10036

Re: United States v. Dan Zhong

Criminal Docket No. 16-614 (AMD)

Dear Counsel:

Enclosed are the following materials:

- The government is re-producing higher quality scanned copies of Chinese language source documents originally produced on September 7, 2018, under Bates numbers DZ067156-DZ067188, together with English language translations of those materials previously produced on September 7, under Bates numbers DZ067189-DZ067224. Also included in this production are an additional scanned copy of a one-page Chinese language source document and a one page document containing three photographs. (DZ069966-DZ070032).
- The government is producing an English-language translation of one Chinese-language email that was inadvertently omitted when the government produced a translation of the attachments to the email. The translation Bates-stamped TR001247A reflects a translation of single-page Chinese-language source email previously produced to the defendant under Bates number ESI00041358.

The government renews its request for reciprocal discovery from the defendant.

Very truly yours,

RICHARD P. DONOGHUE United States Attorney

By: /s/ Ian C. Richardson
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Enclosures (DZ069966-DZ070032) (TR001247A)

cc: Clerk of the Court (AMD) (by ECF) (without enclosures)